

Gary M. Zingaretti
Senior Vice President

February 9, 2006

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**RE: Certification of CPNI Filing
EB Docket No. 06-36
EB-06-TC-060**

Dear Ms. Dortch,

Transmitted herewith, on behalf of Richmond Telephone Company, is a Certification of CPNI filing in accordance with the Commission's Public Notice of January 30, 2006.

To the extent deemed necessary by the Commission, Richmond hereby requests a waiver/extension of the February 6th submission date included in the Public Notice. Richmond believes that good cause exists for granting this three-day waiver / extension filing.

Should any questions arise regarding this filing, please contact the undersigned at 610-928-3944.

Sincerely,



Cc: Byron McCoy, Telecommunications Consumers Division, FCC (via e-mail)
Best Copy & Printing, Inc. (via e-mail)

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

**CERTIFICATION OF CPNI FILING
OF
RICHMOND TELEPHONE COMPANY**

**EB-06-TC-060
EB Docket No. 06-36**

**Richmond Telephone Company
1416 State Road
Richmond, MA 01254
Phone: (413) 698-3606
Fax: (413) 698-3101**

February 9, 2006

I. Introduction

In response to the FCC's Public Notice, DA 06-223, released January 30, 2006, Richmond Telephone Company, on behalf of itself and its affiliate (Richmond Networkx), hereby submits its most recent compliance certificate maintained in accordance with §64.2009(e) of the Commission's rules.

II. Statement of Compliance with CPNI Requirements

Richmond Telephone Company and its affiliate have implemented operating procedures and safeguards to ensure that it is in compliance with 47 CFR § § 64.2005-64.2009. To this end, Richmond has procedures in place which ensure that:

- The Company does not share CPNI with any affiliates unless that affiliate already provides service to the customer,
- The Company does not share CPNI with any third parties absent a court order or subpoena,
- The Company does not use CPNI in any outbound telemarketing campaigns,
- The Company has a procedure in place to notify customers if CPNI is going to be used or otherwise disclosed, and has a process in place to allow individual customers to "opt out" of this use,
- The Company has procedures in place to authenticate the identity of callers to their business office before any CPNI is discussed,
- All employees who have access to CPNI are advised of the relevant regulations and the related procedures in place to ensure compliance.

III. Certification

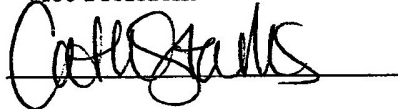
I certify that I am an officer of Richmond Telephone Company. I have undertaken to an investigation, with assistance from personnel within our various operating companies, of the procedures related to CPNI acquisition, storage, protection, use, and customer permission to use data of Richmond Telephone Company and its affiliates. Based on my personal investigation, it is my opinion that the operating procedures of Richmond Telephone Company and its affiliate are generally in compliance with the FCC's CPNI rules as outlined in 47 CFR § § 64.2005-64.2009.

I state under penalty of perjury that the foregoing is true and correct.

Printed Name: Catherine Starks

Title: Vice President

Signature:

A handwritten signature in black ink, appearing to read "C. Starks", written over a horizontal line.

Date: February 9, 2006

Telephone: 413-698-3606